

UNITED STATES DISTRICT COURT
for the

Eastern District of Michigan

United States of America

v.

Raymond Alexander Elliott

Case No.

Case: 2:22-mj-30028

Assigned To : Unassigned

Assign. Date : 1/19/2022

Description: RE: RAYMOND
ALEXANDER ELLIOTT (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of August 2021 - January 18, 2022 in the county of St. Clair and elsewhere in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

18 U.S.C. § 2251

18 U.S.C. §§ 2252A(a)(2) and 2252A(a)(5)(B)

Sexual exploitation of children, including attempt

Receipt, distribution, and possession of child pornography

This criminal complaint is based on these facts:
see attached affidavit.☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: January 19, 2022City and state: Detroit, Michigan
Complainant's signatureKevin J. Starrs Jr., Special Agent (FBI)
Printed name and title
Judge's signatureHon. David R. Grand, United States Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF AN APPLICATION
FOR A COMPLAINT AND ARREST WARRANT

I, Kevin J Starrs Jr., being duly sworn, depose and state as follows:

INTRODUCTION

1. I have been employed as a Special Agent of the Federal Bureau of Investigation for eight months and am currently assigned to the Macomb County Violent Gang and Violent Crime Squad of the FBI, Detroit Division.

2. I am a “investigative or law enforcement officer” of the United States within the meaning of 18 U.S.C. § 2501(7), that is, an officer of the United States who is empowered by the law to conduct investigations of and to make arrests for the offenses enumerated in 18 U.S.C. § 2516.

3. The statements contained in this affidavit are based on my experience and background as a special agent and on information provided by police officers, other agents of the FBI, and other law enforcement personnel. The information outlined below is provided for the limited purpose of establishing probable cause and does not contain all of facts known to law enforcement related to this investigation.

4. This affidavit is made in support of a criminal complaint charging Raymond Alexander Elliott with attempted sexual exploitation of children, sexual exploitation of children, and receipt, distribution, and possession of child

pornography in violation of 18 U.S.C. § 2251, 18 U.S.C. § 2252A(a)(2), and 18 U.S.C. § 2252A(a)(5)(B).

PROBABLE CAUSE

5. On August 22, 2021, a task force officer for the FBI (“UC-1”) assumed the identity of a minor victim following a complaint by the minor’s parents related to sexual exploitation of a child. The minor victim (MV-1) was 13-years old at this time.

6. UC-1 reviewed MV-1’s recent text messages and located a conversation between MV-1 and telephone number (810) 242-****. MV-1’s parents did not recognize the phone number or know where MV-1 obtained that number.

7. The following communications occurred between UC-1 and a subject, later determined to be Elliott, who was using the (810) 242-**** phone number. The following are summaries of some of the communications between UC-1 and Elliott:

8. On September 7, 2021, UC-1 acting in an undercover capacity responded to a text message from Elliott at (810) 242-**** sent on September 6, 2021. On October 10, 2021, UC-1 received another text message from Elliott attempting to engage with minor victim.

9. Elliott requested a “pic” of UC-1. Elliott made it known that UC-1 was communicating with “DrakeArio” from Telegram.¹ Elliott requested a “face pic” followed up with asking how old UC-1 was. UC-1 responded “13”. The subject then asked what UC-1 shoe size was and UC-1 responded “7 and a half.”

10. UC-1 agreed to be the Elliott’s “pup”, a nickname given to a young person by an older male.

11. UC-1 used a purported minor child to take a photograph of feet wearing socks. Elliott alluded to having a foot fetish and then requested a video call, but UC-1 diverted the conversation to how they first met.

12. Elliott later asked UC-1 for a “pic of your shorts”. UC-1 took and sent a purported minor child’s legs wearing navy blue shorts and the same socks from previous pictures exchanged. Elliott then asked UC-1 if he was wearing underwear. UC-1 stated his “mom” was home and communication ceased. Elliott attempted to reinitiate communications over the next two days.

13. On October 14, 2021, Elliott inquired to switch the conversation with UC-1 to Telegram. Elliott requested a “pic” and commented “you used to all the time”. Elliott then sent a picture of MV-1 to UC-1. The picture depicted MV-1 on his hands and knees only wearing socks. MV-1’s genitals and anus were displayed

¹ Telegram is a cross-platform, cloud based instant messaging platform. The service provides end to end encryption video calling, VoIP and file sharing. The platform is based in Dubai and is commonly used by the child exploitation community to remain anonymous.

in a lascivious manner. Elliott brought up Telegram again with the comment “so we can do what we used to”. Elliott asked what UC-1 was wearing and again asked UC-1 to download Telegram commenting “I want you to watch me”.

14. Elliott then asked UC-1 if he was wearing socks and sent UC-1 a close-up photograph of an unknown male wearing red boxers holding his penis with the comment “I need your cute little bottom”.

15. On October 27, 2021, Elliott asked UC-1 “how big are you?” and said “pull yours out” to make him “hard”. Elliott then said “show me your dick cutie”. UC-1 did not comply so Elliott asked to see UC-1’s stomach. UC-1 sent a close-up photograph of a purported child’s abdomen. Elliott then said “show me your hole” and it was clarified subject was referring to anus. UC-1 replied “haven’t you seen mine before?” and Elliott replied “show me it again”. In an attempt to put UC-1 at ease, Elliott sent a photograph appearing to be a male’s region between his abdomen and knees. The male was wearing purple boxers with his hand near his penis.

16. Elliott again asked for a picture and UC-1 sent a similar picture previously sent of a purported child wearing underwear. Elliott instructed UC-1 “pull the head out”. Elliott stated he wanted to “play” and do “sexual stuff” with UC-1. Elliott then asked to see UC-1’s crotch. UC-1 responded that he should put his shorts back on because his mother was home. Elliott told UC-1 to leave them

off to let his mother “see his bulge”. Elliott then sent UC-1 a photo of a male holding his exposed, erect penis with a visible zebra print blanket, claiming the picture was of his “dick”. Elliott told UC-1 if they lived closer the subject would teach UC-1 how to “deepthroat” and stretch his “hole”.

17. Elliott again asked to see UC-1’s “dick” so he could see what he could “suck”. Elliott stated he was masturbating and again asked to see UC-1’s penis. When UC-1 asked where Elliott lived, he replied New York.

18. Elliott then asked UC-1 if he had a dog to do things like “fuck it” and “finger it”. Elliott claimed to have done things to a dog in the past. Elliott again asked for a photograph of UC-1’s “dick,” followed by asking if UC-1’s mother has seen his “dick” lately. Elliott instructed UC-1 to expose himself to his mother. Elliott attempted to persuade UC-1 to do this multiple times because it was “a huge turn on” for him. Again, Elliott asked for a penis photograph.

19. On November 12, 2021, MV-1 was interviewed by an FBI Child Forensic interviewer at the Kansas City FBI Office. MV-1 stated he was contacted by a then-unknown male—later determined by this investigation to be Elliott, but whose identity was not known to MV-1 at the time of the interview---on Instagram with the username “DrakeArio”. MV-1 provided his cell phone number when Elliott requested it. Elliott suggested they “play” while on camera. MV-1 stated the actions were sexual in nature.

20. MV-1 sent explicit photos of himself to Elliott. The photographs depicted his nude body from the chest down to include his front and back sides. MV-1 had a shirt on in some of the photographs, and just underwear in others. Elliott asked MV-1 for specific photographs. For example, one photograph the Elliott requested was for MV-1 on his hands and knees without wearing clothes. Elliott also told MV-1 to touch and rub his penis.

21. These photographs were sent through the application "Telegram". MV-1 stated communications started on Instagram, then text messages, then Telegram. MV-1 recalled seeing Elliott masturbate on camera but could not see his face.

22. IP address and phone record information demonstrated the messages were associated with Elliott and his address in the Eastern District of Michigan and I obtained a warrant to search that address.

23. On January 18, 2022, the Macomb County Gang and Violent Crime Task Force executed a search warrant at Raymond Elliott's address. During the search of Raymond Elliott's bedroom, I seized two laptop computers, one desktop computer tower and one google Pixel smartphone.

24. Special Agent David Opperman and I interviewed Elliott. During the interview, Elliott stated that his cell phone number is (810) 242-**** and the Google Pixel cell smartphone seized was his cell phone, the same number used to communicate with UC-1.

25. Elliott also stated that his Instagram and Telegram username is “DrakeArio”, the same username provided to UC-1. Elliott does not share his usernames, passwords or accounts with anyone else.

26. Elliott told me during the interview that he met a “*****” (MV-1) on Telegram approximately 7-8 months ago and began communicating with him through text message and Telegram. Elliott stated he thought **** was around 15 years old and would send and receive pictures and videos with **** that were sexual in nature. Elliott stated that he would instruct **** what to do for the pictures. When asked if the messages were still on his phone, Elliott stated that the messages were deleted but he saved the pictures to look at later.

27. Elliott stated that he is attracted to boys ages 12 and older. Elliott uses the application Telegram to search for chat groups containing pictures or videos of teenagers. Elliott stated he has two friends, one in Russia and one in Germany, that he exchanges pictures and videos with. Elliott is also communicating with another male who Elliott stated is 17 years old.


28. Elliott provided me with the passcode to his cell phone to show me the chat groups on Telegram, as well as some of his text communications. The most recent group chat Elliott communicated in was titled “Gay Gentlemen Club 16+”. Elliott sent a message to the group chat “I need a boy to text somebody text me”.

29. After looking at the photo album on Elliott’s phone where he stated he kept pictures and videos from “****”, I located numerous pictures and videos of naked boys that appear to be minor children. The pictures and videos were sexual in nature of minor children masturbating or posing naked. The pictures are stored under different folders, some titled Telegram, Kik, Twitter, Screenshots, MEGA Downloads, and messages.

CONCLUSION

30. Based on the above information, probable cause exists that Raymond Alexander Elliott committed the offenses of attempted sexual exploitation of children, sexual exploitation of children, and receipt, distribution, and possession of child pornography in violation of 18 U.S.C. § 2251, 18 U.S.C. § 2252A(a)(2), and 18 U.S.C. § 2252A(a)(5)(B).

Respectfully submitted,


Kevin J. Starrs Jr., Special Agent
Federal Bureau of Investigation

Sworn to before me and signed in my presence
and/or by reliable electronic means.

A handwritten signature in blue ink, appearing to read "David R. Grand", is positioned above a horizontal line.

HON. DAVID R. GRAND
UNITED STATES MAGISTRATE JUDGE

Date: January 19, 2022